

[4910-22]

**DEPARTMENT OF TRANSPORTATION**

Federal Highway Administration

Environmental Impact Statement: St. Clair County, Michigan

**AGENCY:** Federal Highway Administration (FHWA), DOT

**ACTION:** Notice of Intent

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**SUMMARY:** The FHWA is issuing this notice to advise the public that an Environmental Impact Statement (EIS) will be prepared for proposed improvements to the United States Port of Entry Plaza for the Blue Water Bridge in St. Clair County, Michigan.

**FOR FURTHER INFORMATION CONTACT:** Mr. James Kirschensteiner, Assistant Division Administrator, Federal Highway Administration, 315 W. Allegan Street, Room 201, Lansing, Michigan 48933, Telephone: (517) 702-1835.

**SUPPLEMENTARY INFORMATION:** The FHWA in cooperation with the Michigan Department of Transportation (MDOT) is preparing an Environmental Impact Statement (EIS) to evaluate alternatives for potential improvements to the United States Border Plaza at the Blue Water Bridge. Invitations are being sent to other Federal agencies to become cooperating agencies in the development of the environmental impact statement for the subject project.

The Blue Water Bridge is a major passenger and commercial border crossing between the United States and Canada and is the termination point for I-94/I-69 in the United States and for Highway 402 in Canada. MDOT owns and operates the Blue Water Bridge in conjunction with the Canadian Blue Water Bridge Authority (BWBA). MDOT also owns and operates the Blue Water Bridge Border Plaza. Several agencies of the Department of Homeland Security (DHS) operate on the United States Plaza. These agencies are responsible for inspecting vehicles, goods, and people entering the United States and include: the Bureau of Customs and Border Protection (CBP), the United States Department of Agriculture (USDA), and the Food and Drug Administration (FDA). The inspection agencies lease facilities on the United States Plaza from MDOT through the General Services Administration (GSA), which serves as the Federal-leasing agent. MDOT collects tolls from vehicles departing the United States for Canada on the plaza.

The study area is located within the City of Port Huron and Port Huron Township. The study area consists of approximately 30 blocks (195 acres) of urban land use surrounding the existing plaza and ramps, and it extends to the west along I-94/I-69 for approximately 2.2 miles. The study area includes the existing plaza, the Black River Bridge, the Water Street

interchange, and locations for off-site inspection facilities, located north of I-94/I-69 and west of the Water Street interchange.

In September 2002, this project started as an Environmental Assessment (EA) and has proceeded through the scoping phase, Purpose and Need documentation, and alternatives development. Two resource agency meetings and three public information meetings were held during this time. As a result of identified potentially significant impacts, FHWA and MDOT have concluded that an Environmental Impact Statement should be completed.

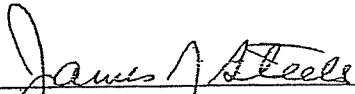
A range of plaza and transportation improvement alternatives will be analyzed within the recommended study area. Reasonable alternatives under consideration include: (1) taking no-action, (2) expanding the existing plaza location in the City of Port Huron, and (3) Relocating the major plaza functions to off-site plaza location in Port Huron Township.

Agencies and citizen involvement will continue to be solicited throughout this process. A public meeting and a public hearing will be held on the Draft Environmental Impact Statement (DEIS). Public notice will be given of the time and place of the hearing. The DEIS will be available for public and agency review and comment prior to the public hearing.

To ensure that the full range of issues related to this proposed action are addressed and all significant issues identified, comments and suggestions are invited from all interested parties. Comments or questions concerning this proposed action and the EIS should be directed to the FHWA at the address provided above.

(Catalog of Federal Domestic Assistance Program Number 20.205, Highway Research, Planning and Construction. The regulations implementing Executive Order 12372 regarding intergovernmental consultation on Federal programs and activities apply to this program.)

Issued on: January 12, 2005

  
James J. Steele  
Division Administrator  
Lansing, Michigan



Michigan Infrastructure & Transportation Association

P.O. Box 1640  
Okemos, MI 48805-1640  
phone 517.347.8336  
fax 517.347.8344  
[www.mi-ita.com](http://www.mi-ita.com)

January 24, 2005

Mr. Z. Kris Wisniewski  
Federal/Bi-national Policy Specialist  
Bureau of Transportation  
425 West Ottawa Street  
PO Box 30050  
Lansing, MI 48909

RE: Blue Water Bridge Plaza Study

Dear Kris:

The Michigan Infrastructure & Transportation Association has quietly supported improving infrastructure along the Michigan frontier. One of the key elements of the Association's mission statement is to see more infrastructure dollars at the federal and state level be spent on transportation links. The Blue Water Bridge Gateway is a critical link in the US/Canadian transportation network. The Michigan Department of Transportation's (MDOT) efforts to expand the capacity of the U.S. Plaza, is an important step in investing in the economies of both nations.

The Michigan Department of Transportation's American Plaza study, designed to expand the U.S. Plaza, is vital to the sustainability of the regional transportation network at this international gateway. Improving the U.S. Plaza will enhance the safety of the general public, efficiency of transportation travel time, fuel efficiency, and regional economic connectivity at this border crossing. Additionally, the improvements to the Blue Water Bridge Gateway U.S. Plaza envisioned by MDOT are consistent with the regionally stated goals in the *Canadian-United States-Ontario-Michigan Border Transportation Partnership Study* and can be viewed as an essential short term step in enhancing border crossing capacity on the Ontario/Michigan frontier. Expansion of the Blue Water Bridge Gateway capacity in no way removes the need for an additional crossing in the Detroit area.

The No Build Alternative, which is carried forward as part of the U.S. environmental impact study protocol, does not address the American Plaza study's project purpose and need on a number of levels, including addressing future traffic volumes, queuing conditions, and inspection requirements. The Association believes that the No Build Alternative is not an option given the

public safety and congestion issues that exist today at the Blue Water Bridge gateway.

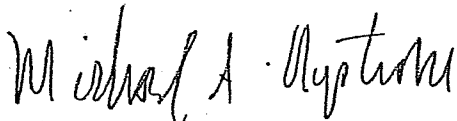
The Association has reviewed the three alternatives presently under the consideration of MDOT. After reviewing these three alternatives, the Association would like to go on record as supporting Alternative Three. We believe that Alternative Three provides the best combination of solutions to enhance the efficiency of the Blue Water Bridge gateway. The Association is concerned about Alternatives One and Two because of the complications arising from these alternatives' construction schedules, disruption in the local community, and their long term practical limitations/impacts on trade.

Alternative Three reflects an innovative new approach to securing the U.S. borders without unduly restricting trade. Alternative Three is in a family of alternatives unto itself. Many of the unique design components reflected in alternative Three to meet the needs of U.S. inspection services cannot be incorporated into Alternatives One and Two because of footprint restrictions placed on these alternatives. Alternative Three limits the damage to the local tax base in downtown Port Huron and this is also an important objective.

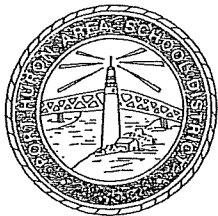
The Association also believes that building an elevated plaza with a limited footprint builds in a degree of obsolesces that cannot be adjusted over time. We would encourage the state of Michigan to move forward in selecting Alternative Three as the preferred alternative.

Finally, it is important to encourage the maximum use of toll revenues and federal funds be used to pay for these improvements so that scarce transportation funding can be made available to many important Michigan projects.

Sincerely yours,

A handwritten signature in dark ink, reading "Michael A. Nystrom". The signature is written in a cursive, flowing style.

Michael A. Nystrom  
Vice President of Government & Public Relations



# Port Huron Area School District

William D. Kimball, Superintendent

1925 Lapeer Ave. • P.O. Box 5013 • Port Huron, MI 48061-5013 • (810) 984-3101

March 9, 2005

Mr. Chris Nazar, AICP  
Senior Transportation Planner  
Wilber Smith Associates  
6709 Centurion Drive, Ste. 220  
Lansing, MI 48917

Mr. Nazar:

In response to our meeting of March 7, 2005 regarding the two proposals for the I 69 - I 94 / Blue Water Bridge proposals, Mr. Kimball and I sincerely appreciate your team's request to meet with us and to give you input.

Our concerns are as follows:

- |                                |   |
|--------------------------------|---|
| <b>Noise -</b>                 | Noise can be very distracting to an educational environment. We have two middle schools, Central & Chippewa, very close to the I 69 / I 94 corridor and the by pass connector. Berms and trees could help this concern.   |
| <b>Security -</b>              | Security is a major concern because nearly 1,500 students plus staff could be in jeopardy from people fleeing law enforcement intervention. Therefore, a strong gage, 6 ft. fence should be placed along any of the common fence lines to help prevent access to school property from the I 69 / I 94 corridor and connector. |
| <b>Wetlands -</b>              | Wetlands are a part of the land being considered. Therefore, consideration needs to be given minimizing disruption to the wetlands.   |
| <b>Drainage -</b>              | The creek which currently passes under the current I 69 / I 94 corridor is fed by a large, 8 ft. diameter drain running behind Central Middle School and discharging directly into this creek. Therefore, special care needs to be given to not obstruct the flow of this surface water drain.                                |
| <b>Transportation Routes -</b> | There is a real need to be able to turn right to the I 69 / I 94 corridor at the Water Street light and then south to the bypass or connector to Lapeer Avenue. While extending Yeager Street, West to Indian Trail is an option, the need to access the Lapeer Avenue area is essential.                                     |

In addition, on March 8, 2005, I spoke with Gary Fletcher, District's attorney, regarding the questions you asked earlier. He is in the process of responding to the questions in writing.

If you need additional information or have any questions, please feel free to contact me.

Sincerely,

Robert C. Beedon, Executive Director for Board & Curriculum  
Port Huron Area School District

RCB/jss

c: W. Kimball G. Fletcher L. Young - MDOT



**City of Port Huron** 100 McMorran Boulevard Port Huron, Michigan 48060

**OFFICE OF THE DIRECTOR OF FINANCE**

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April 12, 2005

Chris Nazar, AICP  
Wilbur Smith Associates  
6709 Centurion Drive, Suite 220  
Lansing, MI 48917

RE: City of Port Huron Property Values

Dear Mr. Nazar:

You have requested information regarding the assessed and taxable values for residential properties and all properties within the City of Port Huron. Attached are worksheets for the 2003, 2004 and 2005 tax years detailing assessed and taxable values by property category. If after reviewing the data, you have questions, please contact the undersigned.

Our assessor's office has provided data in accordance with your prior requests for real property potentially affected by the proposed plaza locations. They do not believe that they have been requested to provide personal property information. As you can see, personal property is almost 20% of the City tax base and commercial personal property has approximately one quarter the value of commercial real property. If you need the personal property taxable values for any affected property, we would be happy to provide it.

We are also concerned about the values of property already acquired by the State of Michigan and, as a result, no longer included in the City tax base. The properties include the former site of London's Farm Dairy, a separate parcel for their trucking operations and several large vacant commercial properties. The City has lost not only property tax revenue, but income tax revenues and water and sewer sales. Further, we are not receiving the expected economic activity from such valuable properties.

We would like to review the detailed analysis of the property tax impact to the City for the proposed plaza sites. Would you please provide your supporting property value information used to analyze the potential cost of the options.

If you have any questions, please contact the undersigned.

Very truly yours,

John H. Ogden, C.P.A.  
Director of Finance

JHO/da  
Enclosure  
cc: Robert Clegg  
Kim Harmer  
Randall Fernandez

CONSTITUENCY OFFICE

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HOUSE OF COMMONS  
OTTAWA, CANADA

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The Honourable Roger Gallaway, P.C., M.P.  
Sarnia-Lambton

OTTAWA, April 25, 2005

Gloria Jeff, Director  
Michigan Department of Transportation  
Van Wagoner Building  
425 W. Ottawa  
PO Box 30050  
Lansing, MI 48909

Re: Blue Water Bridge Gateway

Dear Ms. Jeff:

The steady growth in trade and investment between our two nations continues to be a source of both satisfaction and challenge to our respective federal governments. I am certain that you share my pride in the fact that the Blue Water Bridge Gateway is firmly ensconced as the second-busiest commercial crossing between Canada and the United States. The Gateway complex is in my riding, and as the chairman of the House of Commons Transportation Committee, many of the transportation issues affecting the Blue Water Bridge Gateway fall under my committee's jurisdiction. The importance of this Gateway is well recognized here in Ottawa. Its value to our regional economy as a critical link in the logistics transportation chain is well documented. Well over \$33 billion in U.S. commercial goods crosses through the Gateway each year.

In November 1999, when the Gateway was reopened after twinning and renovation of the first span, several flaws with the American Plaza became apparent. These design matters caused a restriction of Canadian traffic westbound into the United States. Our governments undertook the expansion of the Gateway in the 1990s to better facilitate the ever-increasing commercial crossing traffic along the Ontario/Michigan frontier. Until the impediments with the American Plaza are behind us, this shared goal will not be achieved. In recognition of the Michigan Department of Transportation's commitment in April 2001 to redesign the American Plaza to address our concerns, I wanted to take this opportunity to once again thank you for initiating the American Plaza Study. The projected completion timeline of this study, outlined by the Michigan Department of Transportation's former director, Greg Rosine, was to have the study completed and engineering begun by the spring of 2004. It was our hope that construction of the new American Plaza would begin in late 2005 or early 2006 and be completed by 2009.

Here in Canada, your partner in operating the Gateway, the Blue Water Bridge Authority is undertaking a significant reconstruction of the Canadian Plaza to better facilitate trade and tourism. I am happy to report to you that the Blue Water Bridge Authority (BWBA) has successfully started this project. In the interim, the BWBA, working with the Canadian Border Services Agency, has been able to expand commercial capacity and improve staffing eastbound into Canada.




I am well aware of, and grateful for, the Michigan Department of Transportation's commitment to expanding border capacity along the Ontario/Michigan frontier. Governor Granholm's recent public statements concerning the urgency and the importance of removing obstacles in the planning process to help complete our goal of expanded crossing capacity on the border have been well received here in Canada. Yet, I have recently been advised that there may be a further delay in the American Plaza Study. This delay, I am told, may push back completion of the necessary changes to the American Plaza until 2011. I'd like your thoughts on how we can get the study and construction of the plaza on an expedited completion track.

Your decision to move to a full Environmental Impact Statement is prudent, given the complexity of the project. However, I still believe that with the talented people you have running the study, it is within your department's ability to complete the study and attain a record of a decision by the end of this year, allowing for construction to begin in early 2008, with final completion by 2010. This timetable better fits the proposed timeline my committee has under review for the upcoming construction of an additional crossing to be located in the Windsor/Detroit metro region. I was hoping that you could put additional resources behind the Michigan Department of Transportation's American Plaza Study team in an effort to streamline the study within your department, thereby allowing for better coordination of the study's activities with Canadian stakeholders. Governor Granholm's recent announcement that she is taking similar steps to expedite the Bi-National Partnership Study is the kind of commitment I believe is necessary to fixing the issues with the American Plaza at the Blue Water Bridge Gateway.

It is within the interests of both of our countries to complete the upgrades to the American Plaza and to develop a new crossing in the Windsor/Detroit metro area. Without these essential links, our shared regional economy will find it more difficult to compete. Within our committee, we clearly understand the importance of completing these two vital projects. I personally see the projects as complementing each other, and support the Blue Water Bridge Authority's position that a new crossing is needed on the Ontario/Michigan frontier.

To better highlight these issues, I wanted to take this opportunity to explore with you the possibility of you updating my committee on your department's efforts to improve capacity. I was impressed by your presentation last October, and feel that you could play a vital role in contributing to a better understanding of how much hard work your department has put into making these projects a reality. We share a similar goal of wanting to improve the transportation matrix between our two nations. The Michigan Department of Transportation manages the doorway to the rest of North America for our nation, and it is prudent for us to work together to make sure this doorway swings open to provide prosperity to our citizens.

Sincerely,

  
 Roger Gallaway, P.C., M.P.  
 Sarnia-Lambton



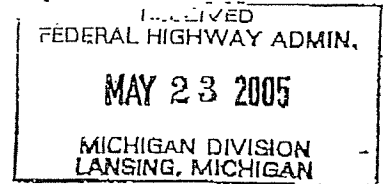
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U.S. Department of Homeland Security  
Washington, DC 20229



U.S. Customs and  
Border Protection

May 16, 2005



Mr. James J. Steele  
Division Administrator  
Federal Highway Administration –  
Michigan Division  
Federal Building, Room 201  
315 West Allegan Street  
Lansing Michigan 48933

Dear Mr. Steele:

This letter is to acknowledge receipt of your letter requesting that Customs and Border Protection (CBP) become a cooperating agency with the Federal Highway Administration (FHWA) in the development of an environmental impact statement for the Blue Water Bridge Plaza Study. We further understand that by entering into this agreement it allows FHWA to establish a cooperative relationship to enhance communication and collaboration between the lead agencies and to obtain commitment for a timely and efficient process regarding key decisions and reviews for the preparation and approval of the environment document for the Blue Water Bridge Plaza Study.

This agencies suggested role would be to provide (1) meaningful and early input on issues involved; (2) participate in coordination meetings and joint field reviews; (3) timely review and comment on environmental documents; (4) and cooperation with the study team in performing data collection/validation at the port of entry.

The Blue Water Bridge Plaza Study has particular interest to CBP in that the preferred alternative being studied offers a solution to the current site constraints but also provides challenges to this agencies ability to secure people and cargo crossing into this country. We therefore look forward to working with FHWA and the Michigan Department of Transportation on the proposed project as a cooperating agency.

If you have any questions, please feel free to contact me at 202-344-1916 or a member of your staff may contact Gary Ragatz at 317-298-1170.

  
Gregory L. Pence



City of Port Huron 100 McMorran Boulevard Port Huron, Michigan 48060

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**Office of the City Manager**

Phone: (810) 984-9740 • Fax: (810) 982-0282

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July 22, 2005

Mr. Kris Wisniewski  
Michigan Department of Transportation  
Van Wagoner Building  
425 W. Ottawa Street  
P. O. Box 30050  
Lansing, Michigan 48909

Dear Kris:

The City has actively participated in the development of the alternatives for the Blue Water Bridge Plaza. We have continually and consistently expressed the City's concerns regarding the construction of the new plaza. In August of 2003 the following comments were sent to your attention:

"...We especially liked alternative 11 because of its minimal impact to City owned private property and access to the City. This alternative is only acceptable if on and off ramps for convenient movements to north and south bound Pine Grove..."

"...We would like to express a concern that for several of the proposed alternatives the eastbound exit from the I69/I94 corridor to downtown Port Huron appears to be not included as part of the project. After all of the comments made at the Initial Concepts Charrette we would have expected that access from the plaza/bridge to Pine Grove Avenue for east and west bound traffic would be included in all illustrative alternatives. Access to/from this corridor is important to the revitalizing of our downtown and the City in general. The City's professionals within the Planning, Police, Fire, and Public Works Department agree that this access is critical in any design alternative..."

The MDOT team was responsive to our concerns and as the alternatives were moved forward and reduced to three illustrative alternatives included access to Pine Grove from the current bridge plaza and an eastbound exit ramp from the I69/I94 corridor to downtown Port Huron. This was shown in each of the three illustrative alternatives. The City continued to support the construction of the plaza expansion approximately 1.2 miles west of the current plaza and supported the proposed ramp south of the current plaza. The City's position as expressed in May of 2004 is as follows:

"...The City is working hard to keep our community viable. We are trying to revitalize our downtown. It is critical that if this alternative is implemented that access to and from Canada by passenger vehicles to Pine Grove be maintained. We also must improve the access from east bound I-94/M-25 to southbound Pine Grove. This will help the City take advantage of this major border crossing and encourage passenger vehicles to visit our downtown..."

As you can see from the City's position at this time, we were clear that we were insisting that access to downtown from the freeway/bridge plaza be improved. In February of 2005 MDOT has reduced the alternatives to two. We were also told that the number of properties impacted by these

alternatives has increased. Alternative 2 which is an expansion within the corporate limits of Port Huron will now result in approximately 147 residential relocations, 33 commercial relocations, and one church relocation. This alternative would place all of the plaza activities at grade level adjacent to established residential neighborhoods. These activities include large truck movements and veterinary services. The inspection of farm animals could result in holding animals for several hours. This type of activity in our neighborhoods is prohibited by our zoning ordinances.

Alternative 3 has also changed since the last time we saw the proposal. This is the first time since August of 2003 that MDOT has removed the exit ramp from eastbound I-94 to downtown Port Huron. This ramp would have been located just south of the existing plaza. We are very disappointed that this important facility has been removed from your plan. Since the beginning of the environmental assessment (E. A.) process, we have expressed the need for improved access from the I-94 Bridge Plaza corridor to downtown Port Huron.

When we met to discuss our concern regarding this matter, we were told that MDOT's intersection at Pine Grove and Hancock was nearing failure. We were told that your consultants have performed traffic modeling of this intersection. Their study indicates this intersection will soon fail under traffic loading. While we all know that traffic modeling is an art not a science and certainly when one is projecting traffic volumes for time periods for long as 20 years the results can be suspect. In addition we fail to understand why it wouldn't benefit the Hancock and Pine Grove intersection to divert a significant traffic movement from east bound 94 to south bound Pine Grove through a dedicated ramp. If increasing lanes at the current intersection is the best solution, it leads us to a conclusion that the computer model is flawed.

It is of the utmost importance to the City of Port Huron's economic development as a "Cool City" in Michigan to improve access to our downtown. We believe this can be done with no detrimental impact to the goals of MDOT to improve the plaza. We are surprised and disappointed that despite our continued efforts to participate in this public process that our concerns are being disregarded this late in the process. We know of many comments from the public requesting the access ramp, please provide the written comments from the public asking that the ramp be removed from the plan. We appreciate the opportunity to express our concerns and expect that the public process will assure that our concerns are included in the final development of the plan.

The City continues to support alternative 3 as the only viable option. We also believe that the eastbound ramp to downtown must be reestablished in this alternative to provide the City with an opportunity to take advantage of this corridor to assist us with our revitalization efforts.

Thank you for your continuing efforts to incorporate our concerns in your plans.

Sincerely,



Thomas J. Hufka, P. E.  
City Manager



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF TRANSPORTATION  
LANSING

GLORIA J. JEFF  
DIRECTOR

August 11, 2005

Mr. Brian Conway  
State Historic Preservation Officer  
Michigan Department of History, Arts and Libraries  
702 W. Kalamazoo Street  
Lansing, Michigan 48909-8240

Dear Mr. Conway:

**ER-930512 Proposed Improvements to the Blue Water Bridge Plaza,  
Port Huron, St. Clair County.**

As required under the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act, and Section 4(f) of the Department of Transportation Act (as amended), the Michigan Department of Transportation (MDOT) is preparing an Environmental Impact Statement (EIS) to evaluate the anticipated impacts associated with the expansion and improvement of the Blue Water Bridge Plaza in Port Huron, Michigan. To continue fulfilling the ongoing coordination required under the NEPA and Section 106 processes, MDOT is requesting that the State Historic Preservation Officer (SHPO) provide a preliminary Determination of Effect (preliminary DOE) that can be included in the Draft EIS.

MDOT recognizes that the alternatives under study are still at a conceptual state of design, and therefore, the preliminary DOE will still require further consideration when a preferred alternative is selected in the Final EIS. At that time, the extent of impact will be more definite and the public will have had opportunities to influence the appearance of the plaza through design workshops. A final DOE will be possible at that time.

MDOT has determined that, based on our preliminary evaluation of cultural resources in the Blue Water Bridge Plaza study area, there will be No Adverse Effect. The accompanying report contains details of the review and analysis.

**Introduction and Project Description**

MDOT retained Wilbur Smith Associates (WSA) to evaluate and/or reevaluate the National Register of Historic Places (NRHP) eligibility of cultural resources located within the Area of Potential Effect (APE) for this project, defined as a 195-acre (78.9 hectare) area roughly centered on the Blue Water Bridge Plaza in Port Huron, St. Clair County, Michigan. The APE is reasonable as it encompasses the entire project limits which account for a worse case scenario for

Brian Conway  
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the potential 2030 footprint of the future plaza. The study evaluated historic structures and performed archaeological field reconnaissance and testing as needed.

#### Above Ground Resources

Previous surveys for above ground cultural resources have been conducted within the APE. Together they inventoried a total of 102 structures, but none were recommended as eligible for listing on the NHRP. Currently only 35 of the 102 previously surveyed structures are still extant.

Qualified professional historians conducted a Cultural Historic Survey for above ground cultural resources in March and September 2003 and identified an additional 184 structures older than 50 years of age. Therefore, in total, the Study Team assessed the NHRP eligibility for 219 structures. Of these, only one structure, located at 2511 10<sup>th</sup> Avenue and known as the E.C. Williams house, was recommended as eligible. This was concurred by the SHPO in a letter dated April 16, 2004.

Of the two remaining alternatives (Alternative 2 and Alternative 3) under study in the Draft EIS, only Alternative 2 comes near the E.C. Williams House. The other alternative, Alternative 3, does not propose any new road construction closer to the E.C. Williams House than the current road configuration.

Alternative 2 proposes a new road alignment within the 10<sup>th</sup> Street block between Church and Elmwood Streets. This block is located directly south of the E.C. Williams House. Due to the proposed changes, an increase in vehicular traffic is likely near the property. However, this change in landscape and traffic will not affect the characteristics that make this property historically significant. Based on this and the fact that this structure has always been within an urban setting, it is MDOT's opinion that Alternative 2 will not adversely affect this property.

#### Archaeology to Date

Prior to any archaeological field work, archival research was conducted and resulted in the discovery of one previously recorded site (20SC155) within the APE. This site has been determined ineligible for listing on the NHRP. In a letter dated September 18, 2003, from the SHPO to MDOT, the area of the project between Stock's Creek and the existing plaza required no survey. As site 20SC155 is located within this area, SHPO determined no further work was necessary.

Also within the 2003 letter, SHPO requested that both sides of the Black River crossing be subjected to deep testing. Previous test borings in the area had revealed a zone of sandy soil 4-6 feet thick, containing wood, twigs, bark, etc., and which tended to be anywhere from 1 foot to 5-6 feet below the surface. The presence of the sand stratus directed SHPO towards a recommendation that the area should be checked for buried cultural deposits.

On September 2, 2004, the deep testing was conducted by a geomorphologist who assessed the disturbance on the east side of the Black River and recommended no further work. On the west

side of the Black River, however, five trenches measuring about 5 meters in length were excavated. These trenches were placed approximately 60 to 120 meters apart with the last trench (Trench #5) located 340 meters west of the Black River crossing. A buried surface encountered in each trench was very marshy and likely would have been unsuitable for habitation.

To date, no archaeological sites have been found.

#### **Archaeological Work to be Completed if Alternative 3 is Chosen as the Preferred Alternative**

SHPO also stated in the letter dated September 18, 2003, that if Alternative 3 was chosen, the route of the proposed new connector road would need to be surveyed along with the footprint of the new plaza associated with Alternative 3. A windshield survey of the area revealed that a portion the area has been developed into an MDOT facility and is likely to be disturbed.

The following is a brief summary of the field methods to be used if Alternative 3 is selected.

The largest area to be surveyed is the cultivated field (90 acres). If surface visibility is good, then a walk over of the field will be conducted at 10 meter (33 feet) intervals. For the unplowed portions of the field that have no surface visibility, systematic shovel test probes on a 15 meter interval grid (approximately 50 foot grid) will be used. Each shovel test probe will measure about 40 to 50 centimeters (18 to 20 inches) in diameter and be excavated to subsoil. All soils from the probe will be screened through a dry ¼ inch mesh hardware screen. If archaeological sites are found, the interval between the shovel test probes will be shortened to 10 meter (33 foot) intervals to define the site's boundaries.

While the 30 acres located in the existing highway median may be disturbed, a single transect of shovel probes will be excavated within it. Overburden could also be presented and an auger will be used to reach subsoil if this occurs. As for the MDOT facility to the south of the highway, archaeologists will look at the location to determine the need for archaeological testing. There is a possibility that the ground along the edges of the facility might be undisturbed.

#### **Request for Preliminary Determination of Effect**

Based on the archaeological and cultural historic work conducted to date, there will be no adverse effect on above-ground resources in either alternative. To date, there is no known effect on archaeological resources. However, if Alternative #3 is chosen as the final alternative, appropriate archaeological investigations will be initiated by MDOT after consultation with Michigan SHPO. MDOT will follow Section 106 / 4(f) procedures in the event of discovery of archaeological resources at the off-site location.

MDOT therefore requests a preliminary determination of No Adverse Effect for above-ground resources for both alternatives. MDOT also requests a determination of No Adverse Effect for archaeological resources for the work completed to date. However, should Alternative #3 be selected, the route of the proposed new connector road would need to be surveyed from the crossing at Stocks Creek west to the points where the north-bound and south-bound lanes merge.

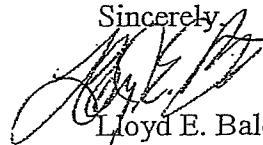
Brian Conway  
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August 11, 2005

into I 69/94. MDOT further requests agreement on the process for any additional work to be done archaeologically in connection with the FEIS.

If the Michigan State Historic Preservation Officer concurs with the preliminary determination of No Adverse Effect pending additional archaeological investigation (if Alternative 3 is selected), please sign on the line provided below.

We look forward to your continued cooperation on this important project.

Sincerely,

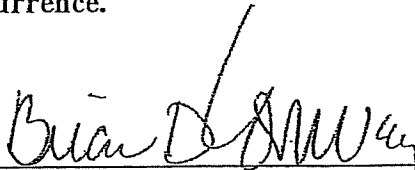


Lloyd E. Baldwin  
Historian  
Project Planning Division  
Environmental Section

Cc: Chris Nazar, Wibur-Smith  
Kris Wisniewski, Paul Mc Allister, MDOT

If the Michigan State Historic Preservation Officer concurs with the preliminary determination of No Adverse Effect pending additional archaeological investigation (if Alternative 3 is selected), please sign on the line provided below. MDOT will continue consultation with SHPO throughout the NEPA process and will that SHPO will be afforded the opportunity to revisit and revise, if necessary, their No Adverse Effect concurrence.

I concur:



State Historic Preservation Officer

10/6/05  
Date



Charter Township of

## Fort Gratiot

JAMES E. BUCKLEY  
*Supervisor*

ROBERT C. CRAWFORD  
*Clerk*

JUDITH A. REYNOLDS  
*Treasurer*

September 1, 2005

US Representative John Espinoza  
State Capitol  
PO Box 30014  
Lansing MI 48909-7514

Dear Representative Espinoza,

On August 17, 2005, the Charter Township of Fort Gratiot passed a Resolution in Opposition to the proposed Blue Water Bridge Plaza (specifically Practical Alternative #3). As Supervisor of this Township and an elected representative of the residents of this Township, I am including a copy of that Resolution and asking for your serious consideration as to what is being proposed and how best to address the issues at hand.

My first concern, as a citizen of the United States living in a community with an international border crossing, is pre-inspection. With all the Homeland Security concerns after 9/11, I believe that all vehicles coming into the United States should be pre-inspected. For us not to address this problem while spending \$300 – \$400 million for a new plaza appears to me to be very short-sighted considering the serious security issues that are facing our Country. None of the plans that have been offered do anything to protect our border by inspecting vehicles before they come across the Blue Water Bridge at the base of Lake Huron, one of the largest sources of fresh water in the United States. Allowing someone out onto that span without pre-inspection is placing both countries, Canada and the United States, at risk.



My second concern, as Supervisor of Fort Gratiot Township, is the impact of this plan on our commercial shopping district. Practical Alternative #3 takes people 1-3/4 miles away from the bridge and away from our Township. This is a great concern for our Township, both for the businesses that have invested in this area based on a certain percentage of Canadian traffic and also for the residents who rely on these same businesses for jobs and taxes to support our community. Due to all the changes that M-DOT would be making in the area if this plan is used, and in consideration of the heavy traffic loads that we already have, M-DOT ought to also consider funding and building an additional bridge over the Black River for traffic moving north and south.

The residents of Fort Gratiot Township, as represented by the Township Board of Trustees, would greatly appreciate your consideration of this matter as it affects not only our Township financial welfare, but also the security of our Country.

Sincerely,

A handwritten signature in cursive script, appearing to read "James E. Buckley".

James E. Buckley  
Fort Gratiot Township Supervisor

Enclosure  
JEB/pgb

## RESOLUTION

### IN OPPOSITION TO THE BLUE WATER BRIDGE PLAZA STUDY PRACTICAL ALTERNATIVE #3

CHARTER TOWNSHIP OF FORT GRATIOT  
COUNTY OF ST. CLAIR, MICHIGAN

Minutes of a Regular Meeting of the Charter Township of Fort Gratiot Board of Trustee's, held on the 17<sup>th</sup> day of August, 2005, held at the Township Hall, 3720 Keewahdin Drive, Fort Gratiot, Michigan, beginning at 7:30 o'clock p.m., Eastern Daylight Savings Time.

MEMBERS PRESENT: BUCKLEY, REYNOLDS, CRAWFORD, SCHLITTS, SCHULTZ AND BRUCKNER

MEMBERS ABSENT: BRADLEY

The following Preamble and Resolution was offered by Member Buckley and supported by Member Schlitts:

WHEREAS, the Charter Township of Fort Gratiot is located at the Northeast Section of St. Clair County, with substantial Residential and Commercial growth; and

WHEREAS, the Commercial District, within Fort Gratiot Township, is located, mainly, along the 24<sup>th</sup> Avenue (M-25) Corridor, allowing effective travel from all directions, including easy accessibility from the Canadian Border from the Blue Water Bridge at Pine Grove Road and I-94; and

WHEREAS, the Charter Township of Fort Gratiot has gone to great lengths to provide for safe, effective travel throughout the Commercial District; and

WHEREAS, if MDOT is bound to use Alternative Plan #3, it should include an additional Black River Bridge crossing for Northbound traffic; and

WHEREAS, the Department of Homeland Security has great concerns for the health, safety and security of citizens traveling throughout the United States, as does the Charter Township of Fort Gratiot.

NOW, THEREFORE, BE IT RESOLVED that the Charter Township of Fort Gratiot Board of Trustee's is emphatically opposed to any Blue Water Bridge Alternate Plan that does not address pre-inspection.

BE IT, FURTHER, RESOLVED that the Charter Township of Fort Gratiot is opposed to Practical Alternative Plan #3, due to the fact that the Plan is too costly, too complicated; and does not provide for safe, efficient ingress/egress to adjacent communities and will be detrimental to Fort Gratiot Township's Commercial District, as well as the Commercial Districts in surrounding communities, in addition to the expense of continually maintaining and securing the paved corridors between the Blue Water Bridges and the Plaza.


BE IT, FURTHER, RESOLVED that this Resolution be sent to Governor Granholm and to our State Legislators.

AYES: BUCKLEY, REYNOLDS, CRAWFORD, SCHULTZ, SCHLITTS AND BRUCKNER

NAYES: NONE


ABSENT: BRADLEY

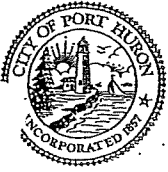
RESOLUTION DECLARED ADOPTED.

  
ROBERT C. CRAWFORD, CLERK  
CHARTER TOWNSHIP OF FORT GRATIOT

CERTIFICATION

I, HEREBY, CERTIFY that the foregoing constitutes a true and complete copy of a Resolution adopted by the Board of Trustees of the Charter Township of Fort Gratiot, County of St. Clair, Michigan, at a Regular meeting held on August 17<sup>th</sup>, 2005, and that said meeting was conducted and public notice of said meeting was given pursuant to and in full compliance with the Open Meetings Act, being Act 267, Public Acts of Michigan, 1976; and that the minutes of said meeting were kept and will be or have been made available, as required by said Act.

  
ROBERT C. CRAWFORD, CLERK  
CHARTER TOWNSHIP OF FORT GRATIOT



City of Port Huron 100 McMorran Boulevard Port Huron, Michigan 48060

---

**Office of City Engineer**

(810) 984-9730 \* Fax (810) 984-2463

[www.porthuron.org](http://www.porthuron.org)

September 14, 2005

Mr. Kris Wisniewski  
Michigan Department of Transportation  
Van Wagoner Building  
425 W. Ottawa Street  
Lansing, Michigan 48909

Dear Mr. Wisniewski:

On August 21, 2003, the City of Port Huron submitted a letter to your attention emphasizing our concern for improved access to our downtown from the Blue Water Bridge I-94/I-69 corridor. As part of the environmental assessment and the environmental impact statement process (EIS), the City has consistently stated its position regarding this issue. This corridor does not currently provide adequate access to our community. As a result past traffic counts do not adequately reflect future traffic movement from this corridor to our City's Center. The City's commercial center, government center, community college, civic center/arena and the Desmond Landing area are all located to the south of the Blue Water Bridge corridor. The City has been recognized for its revitalizing effort by being named a "Cool City" by Governor Granholm and an "All America City" by the National Civic League. The Blue Water Bridge Plaza project will either enhance the City's efforts to revitalize our commercial and residential districts or it will retard our continuing improvements in the community. The unilateral decision to remove the off ramp from I-94/I-69 to Pine Grove from Practical Alternative #3 will harm the City in these efforts. We are being told that you cannot justify the need for this ramp, and we are confused by that statement when it is not included in Practical Alternative #2. An alternative that eliminates residential neighborhoods and a significant amount of commercial property in our community.

The City has been concerned about the lack of access to this corridor long before your current study. The City Master Plan that took approximately a year of public involvement and more than 10 public forums to develop included statements about this issue. I have included with this communication a copy of Chapter 5 "Commercial Districts Development Plan" from the City of Port Huron Comprehensive Plan. This plan stated as:

Goal #1 Port Huron will offer distinct commercial business districts separate from the downtown at key locations along the City's major transportation routes that serve the commercial needs of adjacent neighborhoods and create distinct character.

- Provide a high-quality entrance to the community at the Blue Water Bridge
- Create a Blue Water Bridge Gateway Business district that encourages businesses to serve travelers crossing the USA/Canada border.
- Develop a proper development plan for the mixed-use area along Pine Grove Avenue between the Blue Water Bridge gateway and downtown.

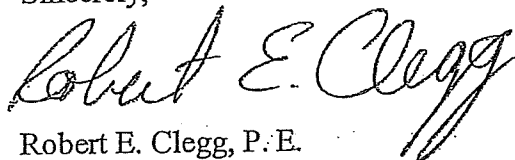
Goal #5 All commercial development sites will promote the character of Port Huron and offer a pedestrian-friendly environment for residents.

- Link downtown with the recommended Blue Water Bridge Gateway Business area.

This off ramp impacts current and future development within the City of Port Huron and is crucial to our goal of maintaining and improving the vitality of our community.

I hope that this information will assist you in fully understanding the importance of access from this corridor directly to our community. It is a critical design feature to any proposed improvements constructed at the plaza.

Sincerely,



Robert E. Clegg, P.E.  
City Engineer/Director of Public Works

REC/cs

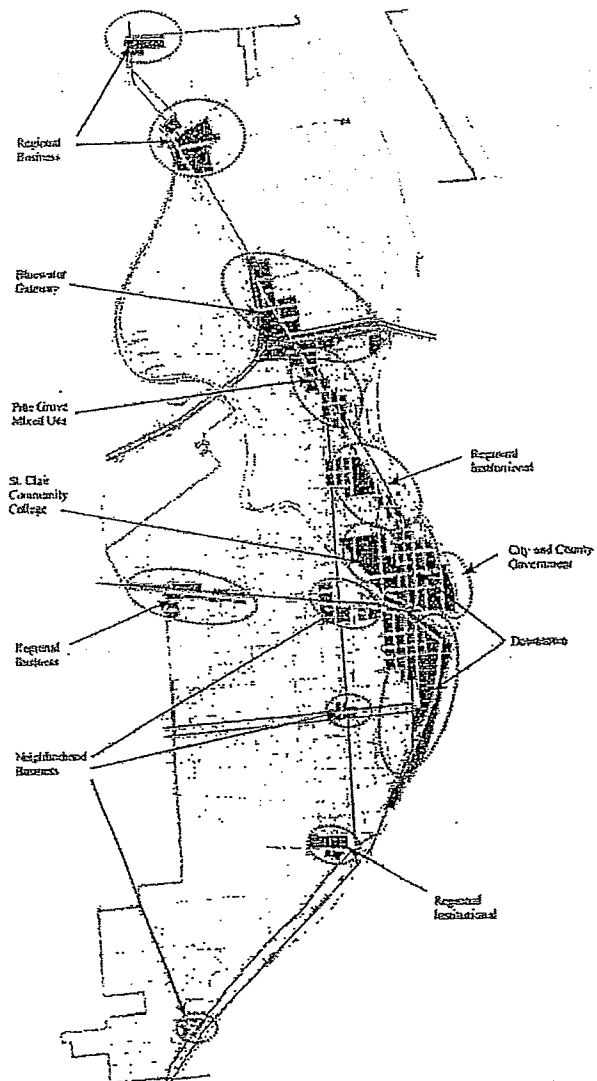
attachment

## CHAPTER 5: COMMERCIAL DISTRICTS DEVELOPMENT PLAN

### INTRODUCTION AND CHAPTER FRAMEWORK

The various business districts in the city provide a range of services that meet specialized needs. This is a result of the time period each area developed, the types of uses in each area, and the relationship of each area to the transportation system and the city overall. Conversely, there are unifying elements that tie the business districts together: the major street system and downtown. The presence of these two elements makes it easy to plan the commercial districts as one defined system. This system is illustrated in the attached graphic. Each area is labeled with different categories consistent with the Future Land Use Plan as follows:

- *Downtown*
- *Regional Business*
- *Blue Water Gateway Business*
- *Pine Grove Avenue Mixed Use*
- *Neighborhood Business*



## CITY OF PORT HURON COMPREHENSIVE PLAN

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### COMMERCIAL DISTRICTS GOALS AND OBJECTIVES



**Goal #1** Port Huron will offer distinct commercial business districts separate from the downtown at key locations along the city's major transportation routes that serve the commercial needs of adjacent neighborhoods and create distinct character.

#### *Objectives*

- a. Maintain a strong general commercial base to serve city residents, tourists, visitors, and nearby communities.
- b. Integrate small scale neighborhood businesses near residential areas to offer convenient shopping for residents.
- \* c. Provide a high-quality entrance to the community at the Blue Water Bridge.
- \* d. Create a *Blue Water Bridge Gateway Business* district that encourages businesses to serve travelers crossing the USA/Canada border.
- \* e. Develop a proper development plan for the mixed-use area along Pine Grove Avenue between the Blue Water Bridge gateway and downtown.
- f. Promote development of an overall marketing plan for all commercial districts.

**Goal #2** All commercial development sites will promote the character of Port Huron and offer a pedestrian-friendly environment for residents.

#### *Objectives*

- a. Adopt design guidelines tailored to the different business districts possessing themes that unify/link with the city as a whole.
- b. Include site design elements in development guidelines such as landscape enhancement, screening, building design, lighting, and signs.



## CITY OF PORT HURON COMPREHENSIVE PLAN

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- l. Recruit appropriate businesses for which there is a market that will enhance the area's ability to attract local and visitor trade.
- m. Develop a policy toward capital budgeting that promotes reuse of downtown dollars drawn for downtown development.

**Goal #4** Downtown Port Huron will offer a walkable, livable environment that is a desirable place to shop, work, live, and play.

### *Objectives*

- a. Maintain the boundaries of downtown at a walkable scale.
- b. Encourage residential dwellings within and abutting downtown.
- c. Maintain sidewalk widths along the street front to accommodate pedestrian activity and other uses such as sidewalk cafes.
- d. Provide sidewalk connections between business, residential, and parking areas.
- e. Promote the application of barrier-free features to commercial sites and buildings as a means of encouraging greater site use.
- f. Maintain and expand the enhanced streetscape throughout downtown.

\* **Goal #5** All other key areas of the city will be linked to the downtown area to unify key assets and to generate more activity where desired.

### *Objectives*

- a. Improve the physical link between downtown and waterfront.
- b. Create a marina/entertainment district as a subarea of downtown.
- c. Connect pathways and green space to neighborhoods and associated neighborhood businesses and civic uses.
- \* d. Link downtown with the recommended *Blue Water Bridge Gateway Business* area.
- e. Improve way finding signs to direct visitors to downtown, historic neighborhoods and other areas of interest.



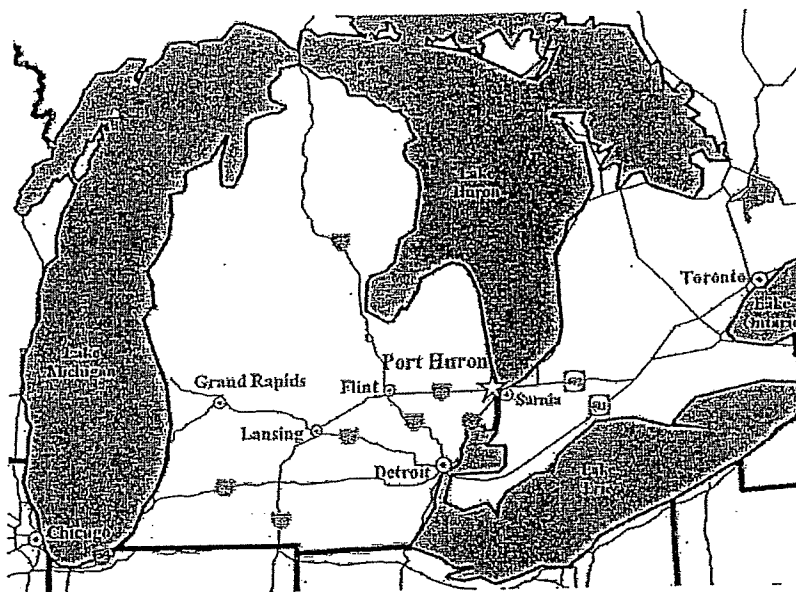


## CHAPTER 6:

# ECONOMIC DEVELOPMENT

### ECONOMIC DEVELOPMENT ANALYSIS

Economic development is a fundamental component of a community. Much activity and land use is associated with the purchase of goods and services or the importation and exportation of goods, services, and jobs from the community. Non-residential development is also very much part of the backbone and cornerstone of tax revenues in a system largely dependent upon real estate.



Port Huron can take advantage of its key location in the overall region for economic development. The Blue Water Bridge is the second busiest border crossing between the United States and Canada. The border crossing through Port Huron is a key link in the I-94/I-69/401/402 corridors between Chicago and Toronto. Also, Port Huron's close proximity to the metropolitan Detroit area plays an important role in economic development and tourism. With the many amenities of the Port Huron area, it is a good weekend get-away for visitors from Detroit.



## ECONOMIC DEVELOPMENT GOALS AND OBJECTIVES

The following are the goals and objectives that will guide the city in developing a strong and complementary economic base. Some of the objectives are followed by more specific recommendations.

- ~~\*~~ Goal # 1 Port Huron will use innovative resources for targeted redevelopment/revitalization areas to increase the desirability of business sites and recruit new businesses.

### *Objectives*


- a. Support development of a business recruitment plan.
- b. Establish and maintain a data bank for vacant commercial properties for referrals to and from private commercial realtors and property interests.
- c. Utilize the resources of the Michigan Economic Development Corporation and St. Clair County to assist with economic development.
- d. Utilize the Brownfield Redevelopment Authority to assist with funding for redevelopment.
- e. Bring together a group of community business leaders (e.g. financial, real estate, industrial, commercial, etc.) on an annual basis for the purpose of offering constructive advice to the City on matters of economic development.
- ~~\*~~ f. Support and participate in the goals and activities of the I-94 International Trade Alliance and capitalize on the Blue Water Bridge border crossing.
- g. Implement the downtown development strategies of the *Commercial Districts chapter* of this plan and the Downtown Development Authority Plan to promote an economically viable and dynamic central business area.
- h. Enhance commercial corridors, through public-private partnership arrangements, the addition of quality streetscape elements, private reinvestment in appropriate design for private



## CITY OF PORT HURON COMPREHENSIVE PLAN

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property and development, other physical efforts, and marketing and promotion.

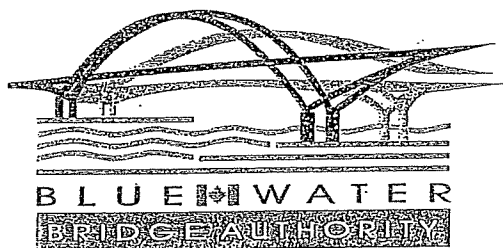
-  i. Beautify major ingress and egress roadways in cooperation with the Michigan Department of Transportation by enhanced landscaping, improved signage and improved quality of design.
- j. Focus business recruitment efforts on industries in which the city and county has an abundance of resources and favorable market position.
- k. Expand and maintain an aggressive recruitment effort for new businesses in complementary and compatible niches and areas of business activity, including those identified in this plan.

**Goal #2**      Port Huron will continue aggressive efforts to retain businesses within the city through a variety of methods that will support their needs and provide benefits that will enrich their investment.

### *Objectives*

- a. Establish a cooperative effort between entities to contact business ownership to identify opportunities for reinvestment and needs of technical, financial and other such assistance.
- b. Provide information with respect to city business trends, possible incentives, assistance, new businesses recruited, expansion plans, etc. to all existing businesses through direct mail, the internet and other forms of communication.
- c. Redevelop areas near the waterfront for public and private sector use, while maintaining public access along the waterfront.
- d. Promote the formation of a cooperative buying group through which independent operations can obtain affordable building and renter related insurance, enhanced purchase prices for other commodities, to assist with maintaining or diminishing the cost of operation.
- e. Support efforts to encourage "in city" consumer spending and business to business spending.





DOUG KEDDY  
*Chairman*  
*Président du conseil*

JIMMY PHAIR  
*Vice-Chairman*  
*Vice-président du conseil*

LIZ KENNY  
*Director/Secretary*  
*Directrice/Adjointe administratif*

BARRY HOGAN  
*Director*  
*Directeur*

DAN M. ELASH, P.Eng., C.I.M.  
*President & CEO*  
*Président - directeur général*

James Steele  
Division Administrator  
Michigan Division  
Federal Highway Administration  
315 W. Allegan Street  
Room 201  
Lansing, MI 48933  
Phone: 517-377-1844

Re: No-Build Alternative

Jim:

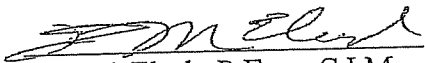
The Blue Water Bridge Authority would like to take this opportunity to write to the record its views on the no-build option being considered as part of the study process to redesign of the port of entry in Port Huron, Michigan. This alternative is unacceptable to the Blue Water Bridge Authority and the Canadian stakeholders it represents. Canada did not undertake the twinning of the Blue Water Bridge Gateway to only have one lane westbound into the United States. The no-build alternative would leave in place the design deficiencies, which rendered the gateway dysfunctional westbound. These deficiencies in the plaza design create a burden on the Canadian economy.

The Blue Water Bridge Authority has recently been briefed by Customs and Border Protection (CBP) that it has placed the design corrections to the American Plaza port of entry in its five-year capital investment plan. The Blue Water Bridge Authority has also been briefed by the U.S. State Department that the situation at the gateway will be corrected.

## The Blue Water Bridge Authority

Accordingly, I believe it is unfair to carry the no-build alternative forward in the study process. For any planning process to be effective, it must be open. The Authority believes that carrying this alternative forward and not informing the public or the stakeholder groups of the decisions made by CBP is inappropriate. The entire study process is better served by having the no-build alternative eliminated from the draft EIS, thereby allowing the public to focus on practical solutions. Your consideration and review of the enclosed report dealing with this subject would be most appreciated. We ask that this letter and the report be made part of the study record.

Sincerely,



Dan M. Elash, P.Eng., C.I.M.  
President & CEO  
Blue Water Bridge Authority

cc:  
Jill Hochman  
Director  
Office of Intermodal and Statewide Programs  
Federal Highway Administration  
HEPS-1, Room 3301  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20590  
Phone: 202-366-0233

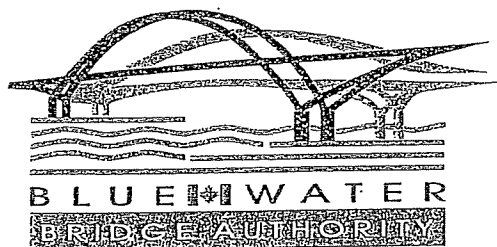
Paul McAllister  
Environmental Planning  
Environmental Section  
Michigan Department of Transportation  
425 W. Ottawa Street  
Lansing, MI 48909  
Phone: 517-335-2622

## The Blue Water Bridge Authority

Kris Wisniewski  
Federal Policy Specialist  
Intermodal Policy Division  
Michigan Department of Transportation  
425 W. Ottawa Street  
PO Box 30050  
Lansing, MI 48909  
Phone: 517-335-2614

Gloria Jeff  
Director  
Michigan Department of Transportation  
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PO Box 30050  
Lansing, MI 48909  
Phone: 517-373-2114

Todd Davis  
Manager  
Environmental/Transportation Planning Services  
✓ Wilbur Smith Associates  
6709 Centurion Drive  
Suite 220  
Lansing, MI 48917  
Phone: 517-323-0500



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James Steele  
Division Administrator  
Michigan Division  
Federal Highway Administration  
315 W. Allegan Street  
Room 201  
Lansing, MI 48933  
Phone: 517-377-1844

Re: Alternative 2

Jim:

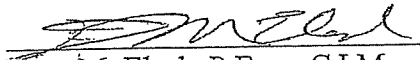
The Blue Water Bridge Authority, under separate letter, would like to formally inform the Federal Highway Administration of the BWBA's decision to support Alternative 2 in the study to correct the design deficiencies with the port of entry in Port Huron, Michigan.

In doing so, the BWBA would like to further express its concerns that the public and other stakeholders be informed about the policy decision made by Customs and Border Protection concerning extended plazas. Customs and Border Protection has determined that an extended plaza at the Blue Water Bridge Gateway does not meet its mission statement and does not fit within the agency's solution set for improving the effectiveness of this port of entry to move commerce between Canada and the United States. The Blue Water Bridge Authority is acknowledging this position, and today is publicly supporting Alternative 2.

## The Blue Water Bridge Authority

Here in Canada, the Canadian Border Service Agency (CBSA) has also informed the BWBA of its decision not to support extended plazas in Canada. The Blue Water Bridge Authority believes the time has come to focus on real solutions that can be implemented at the border in an effort to get the border moving again. It does not serve the public's interest to continue to debate extended plazas, given Customs and Border Protection's position. We believe that the study should move forward to the draft EIS stage with Alternative 2 as the preferred alternative.

Sincerely,



Dan M. Elash, P.Eng., C.I.M.  
President & CEO  
Blue Water Bridge Authority

cc:  
Jill Hochman  
Director  
Office of Intermodal and Statewide Programs  
Federal Highway Administration  
HEPS-1, Room 3301  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20590  
Phone: 202-366-0233

Paul McAllister  
Environmental Planning  
Environmental Section  
Michigan Department of Transportation  
425 W. Ottawa Street  
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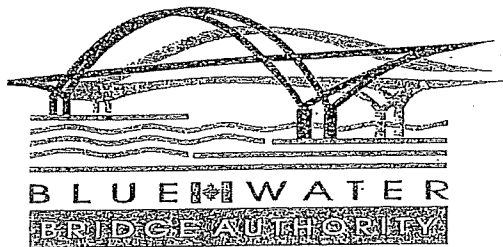


## The Blue Water Bridge Authority

Kris Wisniewski  
Federal Policy Specialist  
Intermodal Policy Division  
Michigan Department of Transportation  
425 W. Ottawa Street  
PO Box 30050  
Lansing, MI 48909  
Phone: 517-335-2614

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Todd Davis  
Manager  
✓ Environmental/Transportation Planning Services  
Wilbur Smith & Associates  
6709 Centurion Drive  
Suite 220  
Lansing, MI 48917  
Phone: 517-323-0500



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James Steele  
Division Administrator  
Michigan Division  
Federal Highway Administration  
315 W. Allegan Street  
Room 201  
Lansing, MI 48933  
Phone: 517-377-1844

Jim:

The Blue Water Bridge Authority would like to submit for your consideration and review a finding concerning the issues surrounding extended plazas. This finding deals specifically with the issues raised in the study to correct the design deficiencies with the port of entry in Port Huron, Michigan. The finding was commissioned by the Blue Water Bridge Authority and the city of Port Huron. The present American Plaza represents a design that limits the throughput capacity of the twin spans. Until the United States corrects these design deficiencies, the full potential of the twinning of the Blue Water Bridge Gateway cannot be met.

The present design of the port of entry in Port Huron was done by the Michigan Department of Transportation. This design incorporated a 100-percent crossover weave at the international line, causing westbound gridlock on the bridge and rendering the gateway dysfunctional. The Blue Water Bridge Authority, to protect the traveling public, had to intervene with a short-term traffic management protocol to correct this situation until the United States could more permanently address the design deficiencies in the plaza. The Michigan Department of Transportation was slow to acknowledge this engineering flaw, and was even slower to acknowledge the concerns of Canada about MDOT's design.

## The Blue Water Bridge Authority

The Michigan Department of Transportation, as the managers of the American Plaza port of entry study under the NEPA process, were advised on August 8, 2005, by Customs and Border Protection that extended plazas would no longer be part of the solution set for improving the efficiency of ports of entry on U.S. borders. We wanted to submit this finding for your review as part of the NEPA process and have it officially entered into the study record. The Blue Water Bridge Authority was an advocate of a different approach to correct the design deficiencies at the port of entry. This alternative approach called for an extended plaza to be constructed. Today, the Authority is formally withdrawing its support for this extended plaza concept and is officially supporting a more traditional plaza design.

Sincerely,



Dan M. Elash, P.Eng., C.I.M.  
President & CEO  
Blue Water Bridge Authority

cc:  
Jill Hochman  
Director  
Office of Intermodal and Statewide Programs  
Federal Highway Administration  
HEPS-1, Room 3301  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20590  
Phone: 202-366-0233

Paul McAllister  
Environmental Planning  
Environmental Section  
Michigan Department of Transportation  
425 W. Ottawa Street  
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## The Blue Water Bridge Authority

Kris Wisniewski  
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Intermodal Policy Division  
Michigan Department of Transportation  
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Todd Davis  
Manager  
Environmental/Transportation Planning Services  
✓ Wilbur Smith Associates  
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Lansing, MI 48917



HOUSE OF REPRESENTATIVES  
LANSING, MICHIGAN  
**JOHN ESPINOZA**

COMMITTEES:  
VETERANS AFFAIRS,  
MINORITY VICE-CHAIR  
CONSERVATION

83RD DISTRICT  
P.O. BOX 30014  
LANSING, MI 48909-7514  
PHONE: 517-373-0835  
TOLL-FREE: 1-888-830-0835  
FAX: 517-373-9876  
E-MAIL: johnespinoza@house.mi.gov

October 5, 2005

Kris Wisniewski, Binational Policy Specialist  
Bureau of Transportation Planning  
425 W. Ottawa St.  
P.O. 30052  
Lansing, MI 48909

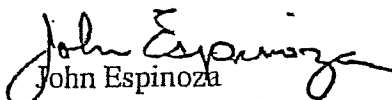
Dear Mr. Wisniewski,

I am forwarding a letter that was sent to me by James E. Buckley, Supervisor of the Charter Township of Fort Gratiot, along with a passed Resolution in opposition to the proposed Blue Water Bridge Plaza, specifically addressing Practical Alternative #3.

Mr. Buckley addresses a number of concerns that the community has regarding the Blue Water Bridge Plaza proposed Alternative #3. Constituents' understanding and knowledge of the project proposals is essential to the success of the construction of Blue Water Bridge Plaza. Please review and address in writing the concerns and questions that have been brought forth by the Charter Township of Fort Gratiot.

Thank you for your time on this matter and please do not hesitate to contact me if you have any additional questions.

Sincerely,

  
John Espinoza  
State Representative  
District 83

CC: Ron DeCook, Michigan Department of Transportation Governmental Liaison  
Mike Szuch, Blue Water Bridge Plaza Manager  
Larry Young, Port Huron TSC Manager  
James Buckley, Supervisor Charter Township of Fort Gratiot



City of Port Huron 100 McMorran Boulevard Port Huron, Michigan 48060

**Office of the City Manager**

Phone: (810) 984-9740 • Fax: (810) 982-0283

[www.porthuron.org](http://www.porthuron.org)

October 27, 2005



Mr. Paul McAllister  
Michigan Dept. of Transportation  
Manager of Project Coordination Unit  
American Plaza Study  
Van Wagoner Building  
425 West Ottawa  
P. O. Box 30050  
Lansing, MI 48933

Re: Submittal to American Plaza Study Record

Dear Mr. McAllister:

The City of Port Huron would like to take this opportunity to again restate its positions concerning the American Plaza Blue Water Bridge Gateway study. The issues under review through this study process will have a significant impact on the community of Port Huron. The decisions at the conclusion of the study will shape the future of our city for generations to come. In this light, as City Manager, I wanted to take this opportunity to again express our community's positions and concerns.

The City of Port Huron formally supports Practical Alternative 3 and the family of alternatives represented by this concept. Practical Alternative 3 conceptually calls for the construction of an extended bridge plaza for the Blue Water Bridge Gateway approximately 1.7 miles west of the international border. This alternative, the City of Port Huron believes, meets the requirements of the project's objectives as stated in the Purpose and Need statement for the study.

In comparison, Practical Alternative 2 would greatly disrupt the community of Port Huron. Our strongest concern about Practical Alternative 2 is its long range impact on development and traffic patterns within our community. Our City Council has expressed its lack of support for Practical Alternative 2 because of the following impacts. At this junction of this study, the community of Port Huron would like to again take this opportunity to write to the record under NEPA, these concerns with Practical Alternative 2. As City Manager of Port Huron, I feel it is important to again write to the record and ask the Michigan Department of Transportation to assure the City of Port Huron that the concerns listed below are adequately addressed through the study.

*Maritime Capital of the Great Lakes®*

• **Air Pollution**

It is the City of Port Huron's position that Practical Alternative 2 would have a large volume of semi trucks and cars stopping and idling adjacent to residential neighborhoods. The neighborhoods left untouched by the acquisition process will remain within close proximity to the complex. The vehicles will be at grade level, and this will increase the dispersion of this polluted air into the adjacent neighborhoods. Practical Alternative 2 also envisions the relocation of the Department of Agriculture inspection processes into the City of Port Huron. We believe that the draft EIS must address these issues.

• **Socioeconomic**

It is the City of Port Huron's position that our community will lose approximately 150 residential properties under Practical Alternative 2. The homes that will be lost are affordable owner-occupied dwellings. Affordable housing in a neighborhood setting is difficult to find in St. Clair County. This housing stock and the neighborhoods surrounding Practical Alternative 2 provide a balance which would be difficult to replace. We believe that the draft EIS must address this issue.

The community of Port Huron has estimated that Practical Alternative 2 would displace approximately 36 commercial properties in our core City. The loss of businesses within our community will change the economic matrix and shopping patterns of our citizens. The loss of these 36 commercial properties and the business activity they represent will significantly impact the City of Port Huron's tax base. We believe that the draft EIS must address this issue.

The community of Port Huron has calculated that the total fair market value of the property that would be removed under Practical Alternative 2 is approximately \$32 million. This translates into a potential \$13 million property tax loss in city revenues. We believe that the draft EIS must address this issue.

Practical Alternative 2 will place upon the City of Port Huron a greater demand for emergency, police and public works services presently not within the city's budget. In the post 9/11 era, small communities such as Port Huron have been asked to shoulder a greater degree of costs in keeping our nation safe and secure. The community of Port Huron believes that these issues have not been adequately addressed to date in the public hearings. The City of Port Huron believes that these issues need to be addressed by the study in relationship to how Practical Alternative 2 addresses these issues under the Purpose and Needs statement. The study needs to address how these essential services are provided to the second largest border crossing on the Michigan/Ontario frontier. We believe that the

draft EIS must address this issue.

- **Community Master Plan and Linear Connectivity**

It is the City of Port Huron's position that Practical Alternative 2 will have a significant impact on the community's ability to maintain cohesion within the community. The City believes that consideration under the study should be given to how Practical Alternative 2 and the buildings and facilities it represents will interface with the community's river front project, its historic districts, and its adjacent neighborhoods. We believe that the draft EIS must address this issue.

- **Light Pollution**

It is the City of Port Huron's position that Practical Alternative 2, if not properly designed, would generate a significant amount of light pollution adversely affecting adjacent neighborhoods. We believe that the draft EIS must address this issue.

- **Local Traffic Mobility**

It is the City of Port Huron's position that Practical Alternative 2 will have a significant impact on the traffic patterns within the community of Port Huron. Practical Alternative 2, as presently represented in the study, would eliminate and greatly impact the City's only three major north/south corridors. The impact to traffic movement and the ability of our emergency response services depends upon the ability of our citizens to move effectively through our north/south corridors. We believe that the draft EIS must address this issue.

- **Access to Community Medical Services**

It is the City of Port Huron's position that Practical Alternative 2 does not adequately address how the citizens of our community will be able to access community medical services. The impact to the community's north/south corridors extends beyond the commercial and residential issues addressed above in this regard. We believe that the draft EIS must address this issue.

- **In-transit Hazardous Materials**

It is the City of Port Huron's position that Practical Alternative 2 does not adequately address the movement of in-transit hazardous materials throughout city. The City believes that the study needs to take a second look at this issue in relationship to how Practical Alternative 2 interfaces with existing Federal, State and Community response plans. We believe that the draft EIS must address this issue.



• **General Emergency Response**

It is the City of Port Huron's position that Practical Alternative 2 has not taken into proper consideration the impact the Alternative would have on the City's ability to provide police and fire response within the community. Practical Alternative 2 will place additional administrative and physical burdens upon the City of Port Huron's Fire and Police Departments. This will create longer response times to police and fire emergencies because of the Alternative's impact on traffic patterns within the city. One of the core responsibilities of a city is to provide these essential services to its citizens in a timely fashion. We believe that the draft EIS must address these issues.

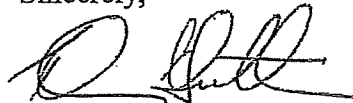
• **Noise Pollution**

It is the City of Port Huron's position that Practical Alternative 2 will bring about a significant rise in the noise levels in the adjacent neighborhoods to the Alternative. We believe that the draft EIS must address this issue.

These are some of the key concerns the community of Port Huron has regarding Practical Alternative 2. It should be noted for the record that many of the concerns the community has about Practical Alternative 2 are not manifested within Practical Alternative 3. The intent of this letter is to bring to the attention of the State Planning Team these nine concerns and formally ask that these concerns be addressed under the EIS process through a collaborative effort. The City of Port Huron has taken note that under U. S. Customs and Border Protection planning guidelines, community concerns are given consideration in development of "port of entry footprints." As part of the EIS process, the City of Port Huron would like the opportunity to have greater collaboration with Customs and Border Protection and the Michigan Department of Transportation in evaluating how these nine concerns are addressed in the draft EIS.

We look forward to continually working with the State of Michigan through the EIS process.

Sincerely,



Thomas J. Hutka  
City Manager



The Honourable Roger Gallaway, P.C., M.P.  
Sarnia-Lambton

OTTAWA  
November 17, 2005

Governor Jennifer Granholm  
Office of the Governor  
George W. Romney Bldg.  
111 S. Capitol Ave.  
Lansing, MI 48909

Governor Granholm:

I wanted to take this opportunity to update you on my views concerning the study being conducted by the Michigan Department of Transportation on behalf of the Federal Highway Administration to correct the design deficiencies of the American Plaza at the Blue Water Bridge Gateway. As the Chairman of the Standing Committee on Transport (SCOT) and through my riding office, I have had the opportunity to take a second look at the Michigan Department of Transportation planning process. What I have found is troubling.

The American Plaza's present design represents a restraint on trade that limits the throughput capacity on commercial goods and services moving into the United States from Canada on the twin spans. Until these design deficiencies are corrected, the full potential of the twinning of the Blue Water Bridge Gateway cannot be realized.

The plaza's initial configuration was designed for a single span. This single-span design was adjusted by the Michigan Department of Transportation during the twinning of the Blue Water Bridge Gateway rendering the Gateway dysfunctional. A 100-percent crossover weave was created at the international line, causing westbound gridlock on the bridge. The Blue Water Bridge Authority implemented a short-term traffic management protocol to correct this situation until a new American Plaza could be built.

The Michigan Department of Transportation was slow to acknowledge this engineering flaw and even slower to acknowledge the concerns of Canada about this design. Even today, within your state Department of Transportation, there seems to be reluctance by the senior management to acknowledge the need to expedite the redesign of the American Plaza.

In brief, the full throughput border crossing capacity of the twinning project will not be realized until the American Plaza is rebuilt. My office in the late 90's intervened to take the Canadian concerns to former Governor Engler. He made a commitment to my office and to Canada to correct this issue. The first step of the process was undertaken by former state Michigan Department of Transportation Director Greg Rosen who commissioned a study process to determine how best to reconfigure the American Plaza. This study process was to be concluded by 2004. It was the hope of my office that the design issues on the American Plaza would be corrected by 2007.

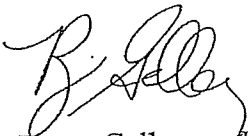
Today I find myself having to revisit these issues and again having to start a dialogue with your good office to explore how we can find a solution that benefits both of our nations. During my recent inquiry, I was troubled to learn that the Michigan Department of Transportation was advised on August 8<sup>th</sup> by U.S. Customs and Border Protection that extended plazas would no longer be a part of the solution set for improving ports of entry on the United State's northern border. I was troubled to learn that this one issue has caused a delay in the study process.

Earlier I went to great efforts to lend my support to this extended plaza concept in the hope that this solution under NEPA could be implemented expeditiously. I now have come to the conclusion that we need to get the border moving again by focusing on solutions that are obtainable and realistic under existing protocols. To this end, I have informed the Government of Canada, the Canadian Embassy in Washington D.C., the Canadian Border Service Agency, the Blue Water Bridge Authority and the Federal Highway Administration of my decision to withdraw my support from the concept of extended plazas and to support a more traditional plaza footprint such as Alternative 2

found in the American Plaza Study. This decision brings my office into line with the positions supported by CBSA and CBP on how to configure plaza improvements.

On a recent visit to Washington, D.C., I had the opportunity to be briefed by Customs and Border Protection concerning their decision to place the reconstruction of the American Plaza in its five-year capital plan. By January 11<sup>th</sup>, I believe the administrative record on the American Plaza study will be locked into a policy course that leaves little room for change in the study's conclusions. Those conclusions, I believe must reject the no-build alternative and focus on correcting the American Plaza.

Yours truly,



Roger Gallaway, P.C., M.P.  
Sarnia-Lambton

Copies to:

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U.S. Department of Homeland Security  
Washington, DC 20229

U.S. Customs and  
Border Protection

DEC 30 2005

Susan Mortel  
Director of Planning and Program Operations  
Michigan Department of Transportation  
Bureau of Transportation Planning  
Van Wagoner Building, 425 Ottawa Street  
Lansing, MI 48909

Dear Ms. Mortel:

Currently U.S. Customs and Border Protection (CBP), the Michigan Department of Transportation (MDOT) and the Blue Water Bridge Commission are engaged in planning discussions regarding the construction of a new inspection facility at the Blue Water Bridge in Port Huron, Michigan. CBP fully supports this project that will serve as a critically needed replacement to the current facility at the Port Huron Land Port of Entry. CBP also strongly values the relationship with its partners on this important project and our joint efforts to facilitate trade and security between the United States and Canada. All parties recognize the need for modernized inspection facilities at the Blue Water Bridge. The age and configuration of the current facility causes an inefficient flow of people and goods through the port and an inability to fully support the CBP missions of antiterrorism and trade facilitation. To remedy these deficiencies, CBP has included a new inspection facility project at the Blue Water Bridge as part of its five-year capital investment plan. CBP seeks to enhance and expand the ability of the site to fully support current and future operations. These objectives can be accomplished by increasing the number of truck and privately operated vehicle inspection lanes, utilizing more efficient and flexible design layouts and technologies, and eliminating existing space shortages and site flaws among other improvements.

On two occasions, MDOT has briefed and recommended to CBP that the new inspection facility be constructed 1.5 miles inland from the terminus of the Blue Water Bridge. This proposal requires the creation of a secure traffic corridor between the bridge and the new inspection facility. The proposed alternative would require that CBP officers be located at the bridge, along the corridor, and at the interior plaza. Such a configuration would split staffing resources and be detrimental to secure and efficient cross-border movement. CBP has serious safety and security concerns regarding the proposed alternative believing that it will create new and unacceptable security vulnerabilities. To be viable, this alternative must fully recognize and address the safety and security requirements

of CBP. In addition, MDOT must prove that CBP's safety and security requirements can be implemented, and maintained at no cost to the federal government.

Although deficiencies exist at the current inspection facility, its location at the immediate termination of the Blue Water Bridge provides the best location for CBP to meet its security and trade missions. The current site provides the optimal location to prevent the admission of unauthorized people and goods, better prevents the introduction of a weapon of mass destruction to the interior of the United States, and eliminates the risks posed by an overextended site footprint. The expansion of the current site, through land acquisition and new construction, is the preferred alternative of CBP for the improvement of inspection facilities at the Bluewater Bridge. CBP is open and willing to evaluate all options to expand in place while minimizing the socioeconomic impact to the surrounding community.

As a Cooperating Agency in the development of the MDOT environmental analysis and documentation process, CBP has reviewed the alternative configurations proposed by MDOT. The overriding consideration of the project must be a rigorous analysis of alternatives that meet the statutory mission of CBP and which are feasible to implement based on economics, technical, staffing, and security aspects. Under our statutory responsibility, CBP must identify as early as possible, the constraints that would limit our ability to execute our mission based on our *"jurisdiction by law"* for the project. Based on guidance provided by the Presidential Council on Environmental Quality (CEQ), *"...if a lead agency leaves out or ignores the advice and expertise of the Cooperating Agency the EIS can be found to be inadequate..."* resulting in project delay. Identifying the CBP "preferred" alternative as early as possible allows full disclosure during public meetings and during the draft and final EIS review and comment periods. Based on the project schedule presented at the meeting on December 1, 2005, CBP believes that Draft Environmental Impact Statement (DEIS) currently under development must clearly articulate CBP's minimum acceptable standards for a safe and secure inspection facility as well as our concerns regarding the recommended alternative and CBP's preferred alternative. Addressing these concerns in the earliest DEIS is in the best interest of MDOT, CBP and the public.

I hope that this confirmation of the CBP position and commitment assists all the partners in moving this important project forward. We look forward to working with you, and I appreciate your continued support. If you have any questions or



concerns, please do not hesitate to contact me at (202) 344-2300, or a member of your staff may contact Mr. Gary Ragatz, Chief, Field Operations Branch, Portfolio Management Division, at (317) 298-1170.

Sincerely,

Richard Balaban  
Assistant Commissioner  
Office of Finance

cc: Z. Kris Wisniewski, Project Manager